



EPSTEIN DRANGEL LLP

60 East 42nd Street, Suite 1250, New York, NY 10165
T: 212.292.5390 • E: mail@ipcounselors.com
www.ipcounselors.com

June 17, 2025

VIA ECF

Hon. Jeannette A. Vargas
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

MEMO ENDORSED


Re: *Telebrands Corp. v. Guangzhou Alpaca Home Furnishing Co., Ltd.d/b/a Xirssvy us, et al.*, Case No. 25-cv-3646 (JAV)
Letter Regarding Expedited Discovery

Dear Judge Vargas,

We represent Telebrands Corp. (“Plaintiff”) in the above-referenced matter (the “Action”).¹ On June 16, 2025, the Court entered an Order directing Plaintiff to file a letter explaining why expedited discovery is still warranted at this time. (Dkt. 61). At this juncture, Plaintiff is interested in expedited discovery for the sole purposes of facilitating settlement negotiations and Plaintiff will continue to discuss such informal discovery for this purpose with each Defendant. In the meantime, Plaintiff withdraws its demand for formal expedited discovery from Defendants pursuant to Paragraphs 4(a) & (b) of the Preliminary Injunction Order. (Dkt. 54). Plaintiff’s preference is to promptly enter into a Case Management Plan with Defendants in order to otherwise expedite discovery in the Action.

We thank the Court for its time and attention to this matter.

Based upon Plaintiff’s submission herein, the Court VACATES Paragraphs 4(a) and 4(b) of the Preliminary Injunction Order (ECF No. 54) entered on June 5, 2025, that grant expedited discovery vis a vis Defendants. The Clerk of Court is respectfully directed to terminate ECF No. 59.
SO ORDERED.


HON. JEANNETTE A. VARGAS
UNITED STATES DISTRICT JUDGE

Respectfully submitted,

EPSTEIN DRANGEL LLP

BY: /s/ Jason M. Drangel
Jason M. Drangel (JD 7204)
jdrangel@ipcounselors.com
60 East 42nd Street, Suite 1250
New York, NY 10165
Telephone: (212) 292-5390
Facsimile: (212) 292-5391
Attorneys for Plaintiff

Date: 6/18/2025

¹ Where a defined term is referenced herein but not defined, it should be understood as it is defined in the Glossary in Plaintiff’s Complaint or Application.